



Kraft Foods

Sheryl A. Marcouiller  
Senior Food and Drug Counsel

May 14, 1998

Felicia B. Satchell, Chief  
Food Standards Branch (HFS-158)  
Division of Programs and Enforcement Policy  
Office of Food Labeling  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

Re: Petition for Temporary Marketing Permit  
Salad Dressing

Dear Ms. Satchell:

Kraft Foods, Inc. requests a temporary permit to market test salad dressing with an oil content at or near the minimum permitted under the standard. To accomplish this fat reduction in the salad dressing, Kraft seeks a permit to add safe and suitable preservatives, such as potassium sorbate and phosphoric acid, which are not covered by the current standard. Additionally, Kraft seeks a permit to adjust the emulsification system of the salad dressing by reducing the amount of egg below the amount required by the current standard and adding other safe and suitable emulsifiers, such as polysorbate 60. This request is consistent with the petition dated January 13, 1998 filed by The Association for Dressings and Sauces (ADS), in which ADS asked the Food and Drug Administration to revise, simplify, and modernize the standard of identity for salad dressing.

The information required by the regulation governing temporary marketing permits, 21 CFR 130.17, is provided below.

1. The applicant is Kraft Foods, Inc., Three Lakes Drive, Northfield, IL 60093.
2. Kraft is regularly engaged in the business of manufacturing and marketing salad dressing at several facilities throughout the United States.

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3. The applicable standard of identity for salad dressing is 21 C.F.R. 169.150.
4. The product Kraft proposes to market is salad dressing containing less oil than the salad dressing Kraft sells today, but containing as much oil as is required under the existing standard of identity. To reduce the oil content, Kraft needs to use well accepted techniques not contemplated by the standard to assure that the quality, flavor, and texture of the product are maintained. Although these techniques may be used singly or in combination, we are including them all in this petition to conserve Agency resources.

Initially, Kraft proposes to market a salad dressing containing safe and suitable preservatives, such as potassium sorbate and phosphoric acid. As the oil content of salad dressing is reduced, even within the levels permitted under the standard, moisture content increases and the acid and salt to moisture ratios decrease. As a result, a preservative is needed to prevent spoilage due to yeast or mold growth.

Additionally, Kraft proposes to market a salad dressing containing less egg than required by the current standard and/or containing safe and suitable emulsifiers other than egg, such as polysorbate 60. As the oil content of salad dressing is reduced the flavor system changes and the current egg levels become too strong. The texture also changes due to the change in oil emulsifier ratio. Therefore, both the egg content and emulsification system need to be adjusted to accommodate the lower oil level without changing the organoleptic characteristics of the salad dressing.

5. The salad dressing that is the subject of this application is just as wholesome and non-deleterious as other salad dressing available to consumers under the existing standard of identity. No novel ingredients or processes are used in making the product.
6. The existing standard for salad dressing does not include preservatives or emulsifiers in the list of permitted optional ingredients, although preservatives and emulsifiers other than egg are commonly used in other dressing products in accordance with good manufacturing practice, typically at levels less than 1% for preservatives and less than 3% for emulsifiers.

Egg is presently required by the standard at a 4% level, but lower egg levels produce a more optimum emulsification system, when the oil level is reduced. Therefore, Kraft seeks a permit to reduce the egg content of

salad dressing below 4% and to substitute or add other safe and suitable emulsifiers, such as polysorbate 60, at levels consistent with good manufacturing practice.

7. The purpose of the variation is to facilitate the market testing of salad dressing made with less oil under the statement of identity that is in common use. The lower oil product is in compliance with the standard, but the use of safe and suitable preservatives and emulsifiers as well as a reduced egg level are necessary to maintain product quality, texture and flavor.

Additionally, the temporary permit will facilitate the collection of data on consumer acceptance of the product to support the ADS petition for a revised standard of identity for salad dressing already on file.

8. The variation from existing standards would benefit consumers by making lower oil formulations available. Additionally, the variation will allow more efficient production, enabling manufacturers to provide better value for consumers.
9. Proposed labels for the food to be market tested under the permit requested are attached. The proposed labels differ only in ingredient lines, although both the ingredient lines and nutrition differ from the labels on the products being sold today. Compared to the current labels, the nutrition for the proposed labels shows fewer calories, less fat, and less saturated fat due to the lower oil content. A final label showing the exact order of ingredient predominance will be submitted when the temporary marketing permit is issued.
10. The time period requested for the temporary permit is July 1, 1998 through November 30, 1999. This period is needed for proper evaluation of product stability and consumer acceptance nation-wide through one complete change of seasons.
11. During the market test period we expect to distribute approximately 26 million pounds of product a month. Thus, during the entire fifteen month period we expect to distribute a total of roughly 390 million pounds of product. This amount of product is needed to assure manufacturing consistency and efficiency as well as to provide for proper evaluation of product stability and consumer acceptance nation-wide through one complete change of seasons.
12. The product will be distributed throughout the United States.

Felicia B. Satchell

May 14, 1998

Page 4

13. The product will be manufactured by Kraft in Garland, Texas; Champaign, Illinois; and Allentown, Pennsylvania. The addresses, telephone numbers, and a contact person for each plant are listed below.

Charles Rasor  
Kraft Foods  
2340 Forest Lane  
Garland, TX 75040  
972-485-6752

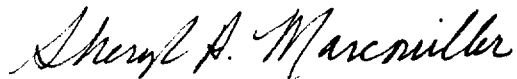
Donald Mackens  
Kraft Foods  
1701 W. Bradley Ave.  
Champaign, IL 61821  
217-378-2116

Raymond Harlin  
Kraft Foods  
7352 Industrial Blvd.  
Allentown, PA 181106  
610-398-0311, extension 250

14. The product will be distributed in the state in which it is manufactured.
15. The product will be distributed in the state in which it is manufactured.
16. Nation-wide distribution is needed to assure manufacturing consistency and efficiency as well as to provide for proper evaluation of product stability and consumer acceptance through one complete change of seasons.

Please do not hesitate to contact me, if you need additional information. Thank you for your consideration.

Respectfully submitted,



Kraft Foods, Inc.

Sheryl A. Marcouiller